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*Of Attorneys for Defendant
Health Net Health Plan of Oregon, Inc.*

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

PORTLAND DIVISION

DWAYNE BRANDON,

Plaintiff,

v.

**HEALTH NET HEALTH PLAN OF
OREGON, INC,**

Defendant.

No. 3:19-cv-00356-AC

**DEFENDANT'S UNOPPOSED MOTION
TO STAY OR EXTEND CASE
DEADLINES DUE TO PENDING
SETTLEMENT**

LOCAL RULE 7-1 CERTIFICATION

Counsel for Defendant conferred with counsel for Plaintiff via telephone on November 12, 2019, and Plaintiff does not oppose this Motion. (*See* Declaration of Jeffrey D. Hern in Support of Defendant's Motion to Stay or Extend Case Deadlines Due to Pending Settlement ("Hern Decl."), ¶ 2.)

MOTION

Defendant respectfully moves the Court for an order staying all currently pending case management deadlines, including the deadline to file and serve objections to the Magistrate Judge's proposed findings and recommendations, due to a pending settlement between the parties. In the alternative, Defendant respectfully requests an extension of fourteen days in which to file and serve its objections to the Magistrate Judge's proposed findings and recommendations, if any.

The parties reached substantial agreement about a settlement of this case per LR 41-1(a) via phone and email conferral between counsel on November 11, 2019. (Hern Decl., ¶ 3.) Defendant anticipates that the parties will consummate a final settlement within fourteen days or less. (Hern Decl., ¶ 4.) Accordingly, Defendant respectfully requests a modest extension to the currently pending case management deadlines in order to allow the parties to finalize their settlement agreement without incurring additional costs.

Dated this 12th day of November, 2019.

Respectfully submitted by,

SCHWABE, WILLIAMSON & WYATT, P.C.

By: s/ Jeffrey D. Hern

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*Attorneys for Defendant
Health Net Health Plan of Oregon, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on the 12th day of November, 2019, I caused to be served the foregoing **DEFENDANT'S UNOPPOSED MOTION TO EXTEND THE DEADLINE FOR OBJECTIONS TO MAGISTRATE'S ORDER** on the following party at the following address:

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<input type="checkbox"/>	Hand Delivery
<input type="checkbox"/>	Facsimile
<input type="checkbox"/>	U.S. Mail
<input type="checkbox"/>	Overnight Courier
<input type="checkbox"/>	E-mail
<input checked="" type="checkbox"/>	ECF Filing

Of Attorneys for Plaintiff

s/ Jeffrey D. Hern

Jeffrey D. Hern, OSB #043138